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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

B.H., a minor by and through her Parent,
Sirbrina Bell,

Plaintiffs,

vs.

CLARK COUNTY SCHOOL DISTRICT;
SCARLETT PERRYMAN, individually, and in
her official capacity as School Associate
Superintendent of Clark County School District;
RYAN LEWIS, individually, and in his official
capacity as Plaintiff's former Principal;
KATHRYN FITZGERALD, individually and in
her capacity as Plaintiff's former teacher of
record; DOES I-X, and ROE
CORPORATIONS I –X, inclusive

Defendant(s).

Case No.: 2:23-cv-00564-JCM-DJA

**JOINT STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFF'S
OPPOSITION TO DEFENDANT LEWIS
AND FITZGERALD'S MOTION FOR
PARTIAL DISMISSAL, PLAINTIFF'S
OPPOSITION TO DEFENDANT CLARK
COUNTY SCHOOL DISTRICT AND
PERRYMAN'S JOINDER TO DEFENDANT
LEWIS AND FITZGERALD'S MOTION
FOR PARTIAL DISMISSAL, AND
DEFENDANTS' REPLIES TO
PLAINTIFF'S OPPOSITION**

Pursuant to District of Nevada Local Rule 6-1, the undersigned counsel of record of Plaintiff
B.H., a minor by and through her Parent Sirbrina Bell ("Plaintiff") and Defendants Clark County
School District ("CCSD"), Scarlett Perryman ("Perryman"), Ryan Lewis ("Lewis"), and Kathryn
Fitzgerald ("Fitzgerald"), submit this stipulation requesting that the Court extend Plaintiff's

1 deadline to file an opposition to Defendant Lewis and Fitzgerald’s Motion for Partial Dismissal and
2 Plaintiff’s opposition to Defendant CCSD and Perryman’s Joinder to Defendant Lewis and
3 Fitzgerald’s Motion for Partial Dismissal from June 26, 2023 to July 6, 2023. The undersigned
4 counsels of record also request that the Court extend Defendants’ deadline to file a reply to
5 Plaintiff’s Opposition to Defendant Lewis and Fitzgerald’s Motion to Dismiss Plaintiff’s Complaint
6 and Plaintiff’s Opposition to Defendant CCSD and Perryman’s Joinder to Defendant Lewis and
7 Fitzgerald’s Motion to Dismiss Plaintiff’s Complaint to July 13, 2023.

8 **I. Recitals**

9 On April 14, 2023, Plaintiff filed a Complaint against Defendants Lewis, Perryman,
10 Fitzgerald, and CCSD. On June 12, 2023, Defendants Lewis and Fitzgerald filed a Motion for Partial
11 Dismissal pursuant to Federal Rule of Civil Procedure 12(b)(6) (“Motion for Partial Dismissal”).
12 On June 16, 2023, Defendants CCSD and Perryman filed a Joinder to the Motion for Partial
13 Dismissal. (“Joinder to Motion for Partial Dismissal”).

14 Pursuant to District of Nevada Local Rule 7-2, Plaintiff’s Opposition to the Motion for
15 Partial Dismissal and Joinder to the Motion for Partial Dismissal (“Opposition”) is currently due on
16 June 26, 2023. Additionally, Defendants’ Replies to Plaintiff’s Opposition (“Replies”) are currently
17 due on July 3, 2023.

18 Plaintiff’s counsel unfortunately came down with illness, so on June 23, 2023, the parties
19 agreed to seek the extension requested in this stipulation in order to allow time for Plaintiff’s counsel
20 to recover. The parties now request that the deadlines for Plaintiff’s Opposition and Defendants’
21 Replies be extended as follows:

- 22 1. The new deadline for Plaintiff’s Opposition: July 6, 2023
- 23 2. The new deadline for Defendants’ Replies: July 13, 2023

24 There have not been any previous time modifications in this case, whether by stipulation or
25 Court order. The requested time modifications should not have any impact on the schedule of the
26 case as the case is in its infancy and was recently assigned to this Court.

27 /././

28 /././

1 **II. Stipulation**

2 Pursuant to the foregoing recitals, which are incorporated herein by this reference, and
3 subject to the Court's approval, the Parties stipulate and agree as follows:

4 Plaintiff's Opposition and Defendants' Reply Deadlines are extended as follows:

- 5 1. Plaintiff's deadline to file an Opposition to Defendant Lewis and Fitzgerald's Motion
6 for Partial Dismissal and Defendant CCSD and Perryman's Joinder to Defendant Lewis
7 and Fitzgerald's Partial Dismissal shall be July 6, 2023;
- 8 2. Defendant Lewis and Fitzgerald's Deadline to file a Reply to Plaintiff's Opposition to
9 Defendant Lewis and Fitzgerald's Motion for Partial Dismissal shall be July 13, 2023;
- 10 3. Defendant CCSD and Perryman's Deadline to file a Reply to Plaintiff's Opposition to
11 Defendant CCSD and Perryman's Joinder to Defendant Lewis and Fitzgerald's Partial
12 Dismissal shall be July 13, 2023.

13 This stipulation and order in Case No. 2:23-cv-00564-JCM-DJA is sought in good faith and
14 not for the purpose of delay.

15
16 **IT IS SO STIPULATED.**

17
18 Dated June 23, 2023

19 **ARIAS SANGUINETTI WANG &
TORRIJOS, LLP**

20 By: /s/ Gregg A. Hubley

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26 *Attorneys for Plaintiff*
27 Dated June 23, 2023
28

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Dated June 23, 2023


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ORDER

IT IS SO ORDERED.

DATED: June 26, 2023


UNITED STATES DISTRICT JUDGE